

FILED 7 JUN '21 10:52 USDC-OR

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland DIVISION

Adam C Clark

(Enter full name of plaintiff)

Plaintiff,

v.

Civil Case No. 2:21-cv-00864-SI

(to be assigned by Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL
RIGHTS (PRISONER COMPLAINT)

Dr. Barth GULICK, Dr. Yin

Dr. Beamer John Doe

Jane Doe etc.

(Enter full name of ALL defendant(s))

Jury Trial Demanded

☒ Yes

☐ No

Defendant(s).

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: Adam C Clark

Street Address: 2500 Westgate

City, State & Zip Code: Pendleton, OR 97801

Telephone No.: _____

Complaint for Violation of Civil Rights (Prisoner Complaint)

[Rev. 01/2018]

Defendant No. 1 Name: Garth Goltz
Street Address: 2500 Westgate
City, State & Zip Code: Pendleton, OR 97801
Telephone No.: _____

Defendant No. 2 Name: Dr. Beamer
Street Address: 2500 Westgate
City, State & Zip Code: Pendleton, OR 97801
Telephone No.: _____

Defendant No. 3 Name: Dr. Ym
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

Defendant No. 4 Name: John Doe
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (check all that apply):

- ☐ Federal officials (a *Bivens* claim)
☒ State or local officials (a § 1983 claim)

Claim 1

On January 28th while ~~in~~ at S.R.C.I, I asked to see a doctor about my broken nose, a serious medical need and was denied my request. On January 29th I asked to see a doctor about my broken nose and was denied.

On January 30th I finally was seen by Dr. Garth Gulick about my broken nose. While consulting with the doctor I asked to go to a hospital to get my nose fixed, I was denied and told that I could breathe through my mouth and sent back to my cell. Dr. Garth Gulick was deliberately indifferent to my serious medical need a violation of the 8th amendment also a constitutional violation against my right to adequate medical care.

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

☒ Yes

☐ No

V. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

I would like to get compensatory damages in the amount of 250,000.00 for pain and suffering. I also would like to receive adequate medical care for my ongoing condition. I would like for an investigation to be done into the lack of medical care given to prisoners

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24th day of May, 2021.


(Signature of Plaintiff)